



U.S. Department of Justice

United States Attorney  
Southern District of New York

MEMO ENDORSED

50 Main Street, Suite 1100  
White Plains, New York 10606

February 8, 2023

The Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Daniel Delgado*,  
22 Cr. 389 (KMK)**

Dear Judge Karas:

The Government writes respectfully to request an adjourned pre-trial conference date and an exclusion of time under the Speedy Trial Act.

This Court set a pre-trial conference for this past Friday, February 3, 2023; the parties expected the defendant, Daniel Delgado, to plead guilty that day. Unfortunately, due to a quarantine at the facility where Delgado is currently housed, the Marshals were unable to produce Delgado.

In anticipation of a plea after that date, the Court referred the case to the duty Magistrate Judge for a plea. The parties have scheduled a plea proceeding for February 22, 2023, at 10:00 am, before the Honorable Paul E. Davison, United States Magistrate Judge.

However, in case that plea proceeding does not occur, the Government respectfully requests that the Court set a new pre-trial conference date. The parties have conferred with the Court's Courtroom Deputy, who has indicated that the Court is available on March 3, 2023, at 2:00 pm. Accordingly, the Government respectfully requests that this Court set a pre-trial conference for March 3, 2023, at 2:00 pm, or such other time as is convenient for the Court, understanding that, if Delgado pleads guilty before that time, and the Magistrate Judge recommends acceptance of that plea, the need for the pre-trial conference will be obviated.

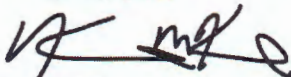
Additionally, the Government respectfully requests that time be excluded under the Speedy Trial Act from today until March 3, 2023, or any other time for which the Court sets the adjourned status conference. The interests of justice in granting the adjournment would outweigh the defendant's and the public's interest in a speedy trial. Among other things, it would allow the parties to attempt to resolve

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the case with a disposition short of a trial, in spite of the quarantine that prevented an earlier plea, and, if a plea does not go through, allow Ms. Quinn and her client to review discovery and otherwise prepare for trial. I have communicated with Ms. Quinn, who consents to the exclusion of time. I have enclosed a proposed time-exclusion order for the Court's consideration.

Please feel free to contact me with any questions.

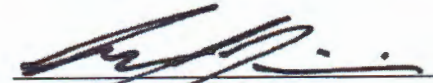
So Ordered.

  
2/8/23

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

By:



Michael D. Maimin  
Assistant United States Attorney  
(914) 993-1952

cc: Elizabeth Quinn, Esq. (by CM/ECF and electronic mail)